



Indiana Economic Development Corporation

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March 3, 2010

Nicholas Rhoad
Director, Indiana Real Estate Commission
402 W. Washington Street, Room W072
Indianapolis, IN 46204

Dear Mr. Rhoad:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document 09-769 and proposed by the Indiana Real Estate Commission ("IREC"). The proposed rule amends 876 IAC 3-6-2 to incorporate by reference the 2010-2011 edition of the Uniform Standards of Professional Appraisal Practice (USPAP). The proposed rule also amends 876 IAC 3-6-3 to update the revisions to USPAP based upon the changes in the 2010-2011 edition.

The economic impact statement prepared by the IREC indicates that the proposed rule is federally-mandated and will result in some increased costs to small businesses which must purchase the updated USPAP. In addition, federal rules also require that appraisers and real estate brokers use and adhere to USPAP guidelines. The electronic version of the USPAP costs \$60 and the hard copy is \$75. Assuming all appraisers and real estate brokers purchase an updated USPAP, the minimum total cost would be \$886,080 and the maximum total cost would be \$1,107,600.

The IEDC does not object to the economic impact to small businesses associated with the proposed rule. As noted above, the provisions of the proposed rule are mandated by federal law. If you have any questions about the comments contained herein please contact me at 232-8962 or rasberry@iedc.in.gov.

Regards,

A handwritten signature in black ink, appearing to read "Ryan Asberry".

Ryan Asberry
Assistant Vice President